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July 27, 2022

VIA CM/ECF

Honorable Frederic Block
United States District Court Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Proposed Stipulation re: Oak Financial Group, Inc. v. Infinity Q Diversified
Alpha Fund et al., Case No. 1:21-cv-03249-FB-MMH**

Dear Judge Block:

Our office represents Plaintiff Oak Financial Group, Inc. in the above-referenced action. We are writing on behalf of all Parties in this action in response to the Court's Order dated July 19, 2022.

The Parties have been in communication concerning the filing of an amended complaint by Plaintiff and Defendants' anticipated motions to dismiss. In this regard, Plaintiff has deferred filing an amended complaint in light of having been advised of a potential resolution of related state and federal class actions (the "Related Actions") that could have a material impact on the pending action.

To date, however, the parties to the Related Actions have not yet announced a resolution of the Related Actions. Accordingly, subject to the Court's approval, the Parties are prepared to proceed as follows:

1. Plaintiff shall file its amended complaint on or before August 26, 2022;
2. Defendants shall file their motion(s) to dismiss 60 days thereafter, on or before October 26, 2022;
3. Plaintiff shall file its answer(s) to the motion(s) 45 days thereafter, on or before December 12, 2022;
4. Defendants shall file their reply(ies) to the motion(s) 15 days thereafter, on or before December 27, 2022, at which time the motion(s) will be fully submitted.

ROSENFELD & KAPLAN, LLP
TO: HON. FREDERIC BLOCK
DATE: JULY 27, 2022
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Thank you for your consideration of this matter.

Respectfully submitted,


Steven M. Kaplan

cc: All counsel of record via CM/ECF in Case No. 1:21-cv-03249-FB-MMH